

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**HAITIAN EVANGELICAL CLERGY  
ASSOCIATION; SERVICE  
EMPLOYEES INTERNATIONAL  
UNION – LOCAL 32BJ; SABINA BADIO  
FLORIAL; YODELAINE DORCIN;  
ROBERT JEAN ALIX ERINAC;  
RACHELLE GUIRAND; DIEU  
YOLNICK JEUNE CADET; AUDOINE  
AMAZAN; GERALD MICHAUD;  
NADEGE JOSEPH MICHAUD; and  
MARIE WILDRIGUE ERINAC MIOT,**

*Plaintiffs,*

v.

**DONALD J. TRUMP, President of the  
United States of America; UNITED  
STATES OF AMERICA; THE  
DEPARTMENT OF HOMELAND  
SECURITY; and KRISTI NOEM,  
Secretary of Homeland Security,**

*Defendants.*

Case No. 1:25-cv-01464-BMC

**NOTICE OF MOTION TO WITHDRAW AS ATTORNEY OF RECORD**

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 1.4, Daniel Werner of Just Futures Law respectfully moves to withdraw as counsel for Plaintiffs in the above-captioned action. Mr. Werner will end his employment with Just Futures Law on January 4, 2025 and no longer has responsibility for this case. Plaintiffs remain represented by other counsel of record in this matter. Pursuant to Local Civil Rule 1.4, an affidavit supporting this motion is unnecessary because Sejal Zota of Just Futures Law continues to represent the Plaintiffs in this matter. A copy of this motion has been served on counsel for all parties by ECF.

DATED: December 18, 2025

Respectfully submitted,

/s/ Daniel Werner

Daniel Werner (pro hac vice  
admission)

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